

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ANA IRIS LOZANO ORTIZ

DEBTOR

CASE NO. 12-08268-ESL

CHAPTER 13

DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #20

TO THE HONORABLE COURT:

COMES NOW, ANA IRIS LOZANO ORTIZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 13, 2015, the Chapter 13 Trustee filed a motion to dismiss, docket #20, stating that the debtor has defaulted in her Plan payments.
2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in Plan arrears due to extraordinary medical expenses because of her medical condition. Attached is copy of the *Unsworn Declaration Under Penalty of Perjury* signed by debtor, dated on March 16, 2015.
3. The debtor hereby respectfully submits that on March 16, 2015, she filed a post-confirmation of 13 Plan in order to cure the arrears owed to Trustee.
4. Furthermore, the debtor respectfully submits that she will make the current Plan payment pertaining to the month of March within the next fourteen (14) days. Therefore, the debtor needs an extension of time of fourteen (14) days in order to make the March payment to the Trustee, which extension of time to expire on March 30, 2015.

WHEREFORE, debtor respectfully requests this Honorable Court to grant the requested extension of time and deny the motion to dismiss, docket #20.

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I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, I also certify that a copy of this motion was sent via US Mail to the debtor, Ana Iris Lozano Ortiz, to the address of record: Savarona Marcelino Sola 6 Caguas, PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 16th day of March, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
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IN RE:

ANA IRIS LOZANO ORTIZ

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CASE NO. 12-08268-ESL
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UNSWORN DECLARATION UNDER PENALTY OF PERJURY

I, **ANA IRIS LOZANO ORTIZ**, debtor in case number 12-08268-ESL, declare under penalty of perjury as follows:

1. That I am the debtor in the above captioned bankruptcy case.
2. That I incurred in Plan payments arrears and these arrears are included in a proposed post confirmation modified Plan, dated March 16, 2015.
3. That I submit this declaration to state the reasons as to why I incurred in these arrears.
4. That during these past months I incurred in extraordinary medical expenses since I underwent medical surgery due to my medical condition and a heart stroke in December 2014, which prevented me from making the Plan payments.
5. That although this declaration is in the English language the same has been translated to me prior to signing the same.
6. The foregoing declaration is submitted under penalty of perjury and I declare that the same is true and correct to the best of my information and belief.

In Caguas, Puerto Rico this 16th day of March, 2015.



ANA IRIS LOZANO ORTIZ